

EXHIBIT A

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VIA EMAIL

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United States v. Kukushkin, et al., Ind. No. 19 Cr. 725 (JPO)

Dear Counsel:

We write as counsel to Andrey Kukushkin in advance of the status conference scheduled for next Monday, December 2, 2019, to inquire as to the existence of certain potential discovery.

During our discussions, the government has advised that no Title III wiretaps were utilized in the course of this investigation. Of course, Title III wiretaps are not the only form of communication intercepts. In a case such as this, involving multiple foreign nationals, foreign communications, foreign travel, and the like, one can imagine various government agencies using other devices – both with and without warrants – to intercept oral or written communications. To date, the existence of such intercepts or overhearings has neither been confirmed nor denied by the government. Accordingly, pursuant to 18 U.S.C. § 3504, we hereby make a formal request that the government conduct a search of all appropriate agencies to affirm or deny whether Mr. Kukushkin's oral and written communications have been intercepted and whether he has been overheard by the government.

In addition, we request that the government affirm or deny whether Mr. Kukushkin, his co-defendants, or any of his alleged co-conspirators, whether or not indicted, has been the subject of the following forms of surveillance:

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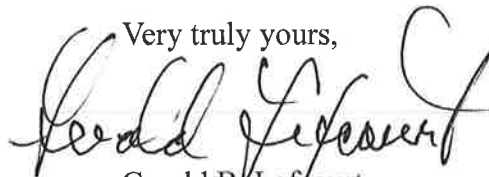
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- NSA wiretaps pursuant to a FISA warrant
- NSA or other intelligence warrantless wiretaps
- Warrantless interception of international communications (written or oral)
- Warrantless social media surveillance, monitoring and/or tracking
- A National Security Letter
- A geofence warrant or surveillance
- StingRay or other IMSI surveillance

We thank you for your consideration and look forward to your response.

Very truly yours,



Gerald B. Lefcourt

cc: All Defense Counsel (via email)